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11 [ADDITIONAL COUNSEL LISTED ON
12 SIGNATURE PAGE]

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 LD, DB, BW, RH, and CJ, on behalf of
18 themselves and all others similarly situated,

19 Plaintiffs,

20 v.

21 UNITEDHEALTHCARE INSURANCE
22 COMPANY, a Connecticut Corporation,
23 UNITED BEHAVIORAL HEALTH, a
24 California Corporation, and MULTIPLAN,
25 INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
OMNIBUS STIPULATION AND OMNIBUS
MOTION ON DISPUTED SEALING
REQUESTS**

Hon. Yvonne Gonzalez Rogers

Hearing: None Set

Complaint filed: April 2, 2020

Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH, and CJ, and Defendants United Behavioral Health,
2 UnitedHealthcare Insurance Company, and MultiPlan, Inc. (together, “Defendants”), collectively the
3 “Parties,” to the above-entitled action jointly submit this stipulation pursuant to the Post-Briefing
4 Omnibus Sealing Procedures in this Court’s Standing Order in Civil Cases. In further support of this
5 Stipulation, the Parties state as follows:

6 **WHEREAS**, on February 13, 2024, the Court issued its Order Granting Modified Sealing
7 Procedures requiring the Parties to “jointly file an omnibus sealing motion within 14 days after the
8 conclusion of the briefing sequence” (Dkt. 399 at 3);

9 **WHEREAS**, on June 10, 2024, Plaintiffs filed their Opposition to Defendants’ Administrative
10 Motion for Leave to File Sur-Reply (Dkts. 436, 437), which concluded the briefing sequence on class
11 certification and triggered the 14-day deadline for the omnibus sealing motion, which landed on June
12 24, 2024;

13 **WHEREAS**, the Court’s Standing Order in Civil Cases allows the Parties “by stipulation filed
14 on the docket, [to] extend the time to file the Omnibus [Sealing] Stipulation and Omnibus Motion[s on
15 Sealing Disputes] to 21 days after the conclusion of briefing,” which would be July 1, 2024, with
16 extensions beyond 21 days requiring approval by the Court;

17 **WHEREAS**, the Parties have agreed to extend the deadline for the Omnibus Sealing Stipulation
18 and Omnibus Motions on Sealing Disputes (if necessary) from June 24, 2024 to July 8, 2024 in light
19 of the voluminous record requiring substantial time for the Parties to meet and confer in an effort to
20 reach agreement on as many sealing requests as possible;

21 **WHEREAS**, the extension of the deadline will not alter the date of any other event or any other
22 deadline already fixed by Court order;

23 **THEREFORE**, the Parties hereby stipulate and agree as follows:

24 The deadline for the Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes
25 (if necessary) currently scheduled for June 24, 2024 is extended to July 8, 2024. If additional time is
26 required for the Parties to meet and confer to finish preparing these documents, the Parties will
27 promptly seek the Court’s approval to extend the deadline beyond July 8, 2024.

1 **IT IS SO STIPULATED.**

2 DATED: June 24, 2024

Respectfully submitted,

3 GIBSON, DUNN & CRUTCHER LLP

4 By: /s/ Derek K. Kraft
5 Derek K. Kraft

6 Attorneys for Defendants UNITED
7 BEHAVIORAL HEALTH and
8 UNITEDHEALTHCARE INSURANCE
COMPANY

9 DATED: June 24, 2024

10 PHELPS DUNBAR LLP

11 By: /s/ Errol King
12 Errol King

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19 DATED: June 24, 2024

20 ARNALL GOLDEN GREGORY LLP

21 By: /s/ Matthew M. Lavin
22 Matthew M. Lavin

23 DATED: June 24, 2024

24 DL LAW GROUP

25 By: /s/ David Lilienstein
26 David Lilienstein

27 Attorneys for PLAINTIFFS

[PROPOSED] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court HEREBY ORDERS that deadline for the Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes (if necessary) is extended to July 8, 2024.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

The Hon. Yvonne Gonzalez Rogers
UNITED STATES DISTRICT COURT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil Local Rule 5-1(i)(3) of the Northern District of California, I attest that concurrence in the filing of the document has been obtained from each of the other signatories to this document.

DATED: June 24, 2024

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Derek K. Kraft
Derek K. Kraft